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December 1, 1993

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20554


DEC 6 1993
FCC - MAIL ROOM

Dear Mr. Caton:

Please find enclosed our comments regarding the Docket No. 93-235, ^{et} Amendment of Parts 15 and 90 of the Commission's Rules to Provide Additional Frequencies for Cordless Telephones.

Also enclosed are six copies of FIT's comments so you may delegate them to the various offices concerned in this matter.

Sincerely,


James H. Baker
Executive Vice President

JHB/klc

enclosure: Comments to Docket No. 93-235

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

In the Matter of Amendment

of Parts 15 and 90 of the)

Commission's Rules to Provide)

Additional Frequencies for)

Cordless Telephones)

ET PR DOCKET NO. 93-235

RM-8094

DEC 6 1993

FCC - WASH DC

COMMENTS OF
FOREST INDUSTRIES TELECOMMUNICATIONS

Forest Industries Telecommunications (FIT) respectfully submits its comments in response to the Commission's Notice of Proposed Rule Making in the above captioned rule making proceeding.

I. INTRODUCTION AND GENERAL STATEMENT

FIT is a national organization of radio users licensed in the Forest Products Radio Service. For more than 40 years, FIT has been recognized, by the Commission, as the Frequency Coordinator for the Forest Products Radio Service. It is also the industry's spokesman on matters pertaining to Land Mobile Radio Communications in the forest products industry. FIT has nearly 2,000 members that range in size from Fortune 500 companies such as Weyerhaeuser Co., Georgia Pacific Corp., etc. to many small to medium sized contract loggers. The forest products industry, being one of the

major, primary industries in America, provides building materials and paper vital to the nation's needs.

Radio serves the vital forest products industry by providing instant communications to dispatch ambulances or medi-copters to get injured loggers to hospitals in time to save a life or limb. Radio provided by the timber industry is also often the first line of defense in forest fire detection and suppression by instantly reporting fires when they are small and can be suppressed before they become raging infernos.

While it is true that logging takes place in rural forested areas, these areas are often adjacent to metropolitan centers in the Northeast, South and Pacific Northwest. Adjacent to such cities as Portland, ME, Portland, OR, Seattle, WA, Redding, CA, Augusta, GA, Mobile, AL and Charleston, SC just to mention a few.

In general, frequency allocations as proposed in this docket would be a damaging mistake that could cause serious interference problems to vital communication links and could be a difficult problem for the cordless phone users. Also of some concern is the potential interference to base, control and mobile Forest Products Radio Service stations in industrial, business and residential districts.

FIT can agree with TIA, Uniden and other manufacturers as to the popularity of cordless phones. FIT does challenge the premise that little or no interference will be caused to PLMRS users because of the extremely low power used by cordless phones, and, also, we need to be concerned

with interference being caused to the cordless telephone users.

Additionally, FIT must take issue and challenge some of the statements made in the subject proposal as well as the basic proposal to use 48-49 MHz frequencies that are employed by high priority major industrial radio users.

Further, FIT must express its serious concern with dissimilar types of usage: high priority, high powered short dispatch messages for safety to life and property critical to efficiency of operation compared with long social visits mostly of little importance on low power devices.

FIT has always promoted sharing of like industries and radio services and has been a pioneer in seeking frequency sharing arrangements with compatible radio users. Users who use radio primarily for push-to-talk for short rapid fire messages to promote efficiency and safety.

II. COMMENTS

First FIT must take issue with the completely erroneous statement that "there do not appear any population centers in which a sizable fraction of the 30 frequencies is assigned".

A review of FIT's data base reveals the following usage by Forest Products Radio Service licensees on the 48-49 MHz frequencies in selected population centers:

<u>City/State</u>	<u># of Licensees</u>	<u># of Transmitters</u>
Augusta, GA	45	486
Charleston, SC	43	436
Eugene, OR	31	422
Mobile, AL	28	305
Portland, OR	44	443
Redding, CA	35	421
Sacramento, CA	27	235
Seattle, WA	33	520
Spokane, WA	24	188
Tacoma, WA	37	504

Some of the major forest products companies employing these frequencies are: Weyerhaeuser Co., Georgia Pacific Corp., Champion International, Boise Cascade Corp., Louisiana-Pacific Corp. and Washington Contract Loggers Assoc. (WCLA). WCLA employs a statewide repeater system in the state of Washington with several hundred members with well over 500 transmitters in and around the major metropolitan centers in that state.

A study of the above list reveals recommended 48-49 MHz frequencies are not lightly loaded but are used for critical emergency situations including the protection of life and vital forests for our nation's use. Since these channels are not lightly used, they do not even meet TIA's own operating requirements and therefore, should not be considered for sharing with cordless telephones.

Additionally, if these frequencies are allocated for cordless telephone use, the telephone users will no doubt have their calls interfered with when high powered users in either the Forest Products or Petroleum Radio Services transmit. For example, if the cordless phone monitors a frequency prior to finding an "unoccupied frequency" it will establish a link. Then the "unoccupied frequency" comes on the air with a 100-300 watt signal from the PLMRS and the phone conversation will be interrupted. These types of interference will no doubt generate interference complaints from the phone users and also formal complaints from the PLMRS user.

When millions of these phones are operating the Commission may have thousands of complaints and unhappy manufacturers who find their phones are being interfered with. The FCC already has enough difficulty responding to various interference complaints without adding a potential new burden of hundreds or thousands more "secondary cordless phones" interference complaints.

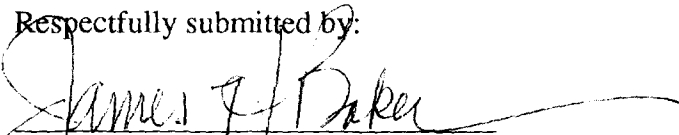
Additionally, FIT does not agree that these proposed allocations are even necessary. Cellular phone usage is growing at a rapid rate. Additionally, the FCC has just finalized the PCS Docket providing for 40 MHz of spectrum for unlicensed personal communications services. These allocations for PCS will no doubt more than meet the need of cordless telephone users. There is also spectrum available immediately for low power, unlicensed operation in the 900 MHz band.

III. CONCLUSION

A plethora of wireless communication devices are coming on the market i.e. cellular, PCS, etc. - services that are primarily for telephone like communications. Therefore, FIT concludes that now is not the time to be allocating additional spectrum to such a service as a low-cost cordless telephone. And, especially to allocate a low-cost device on high-priority, heavy used PLMRS frequencies that are primarily high-powered systems used for priority safety messages. The two types of uses are just not compatible and will lead to serious interference problems causing innumerable interference complaints, both formal from PLMRS users and informal complaints by the hundreds or thousands of dissatisfied wireless phone users.

Wherefore, the premises considered, Forest Industries Telecommunications, urges the Commission to reject this proposal to amend Parts 15 and 90 of its Rules and promptly terminate this proceeding.

Respectfully submitted by:



James H. Baker
Executive Vice President

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Dated: December 1, 1993